

Susan,

The attached memo has been drafted for dual signature by OECA and OAR because OECA currently has the delegation for Applicability Determinations (AD). OAR initiated the development of this memo in the interest of ensuring national consistency in how the MM2A Memo is being referenced by the Regions in ADs.

By way of background:

- OAR provided an initial draft and circulated to OGC and OECA for comment.
- After OECA staff reviewed and provided comment, Patrick Traylor reviewed and provided significant edits with direct consultation with the OAR front office
- This version has been reviewed by OAR and OGC, and OAR is prepared to sign as currently drafted.